

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JASON MICHAEL LEIDEL, and
SARAH ELIZABETH SORG,

Defendants.

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CRIMINAL NOS. 22-mj-02965-JMC
22-mj-02967-JMC
22-mj-02968-JMC
22-mj-02969-JMC

**MOTION TO SUBSTITUTE REDACTED
AFFIDAVIT AND UNSEAL CASE**

The United States of America, by and through its undersigned attorneys, hereby moves this Honorable Court for an Order substituting for the Affidavit submitted in support of the Criminal Complaint, Arrest Warrants, and three Search Warrants in Criminal Nos. 22-mj-02965-JMC, 22-mj-02967-JMC, 22-mj-02968-JMC, and 22-mj-02969-JMC, the attached *redacted* Affidavit (*emphasis added*), and in support thereof states:

The Affidavit submitted in support of the Criminal Complaint, Arrest Warrants, and three Search Warrants contains identifying information of many individuals, including some of whom are victims of the defendants' criminal conduct and others whose identities should be protected from public disclosure. The attached redacted affidavit eliminates to the maximum extent possible identifying information relating to these uncharged parties. However, those same identities are already known to the defendants and, as necessary, will be refreshed in the course of discovery.

The Defendants have been arrested and the reasons for sealing the case no longer apply with the exception of the need to protect identities of non-defendant third parties from public disclosure.

WHEREFORE, the government respectfully requests that the Order Substituting the redact Affidavit be granted and thereafter, the above-captioned matters be unseal and that only the originally submitted Affidavit remain SEALED.

Respectfully submitted,

Erek L. Barron
United States Attorney



P. Michael Cunningham
Thomas M. Sullivan
Assistant United States Attorneys

ORDERED as prayed this 20th day of October, 2022. The redacted Affidavit is substituted for the originally submitted Affidavit, and the case is UNSEALED, except that the originally submitted Affidavit will remain UNDER SEAL.



Honorable J. Mark Coulson
United States Magistrate Judge

